

Richard Kamprath (admitted *pro hac vice*)
rkamprath@mckoolsmith.com
MCKOOL SMITH, P.C.
300 Crescent Court, Suite 1200
Dallas, Texas 75201
Telephone: (214) 978-4000
Facsimile: (214) 978-4044
Joshua W. Budwin (admitted *pro hac vice*) jbudwin@mckoolsmith.com
MCKOOL SMITH, P.C.
303 Colorado Street, Suite 2100
Austin, Texas 78701
Telephone: (512) 692-8700
Facsimile: (512) 692-8744

*Attorneys for Plaintiffs InterDigital, Inc.,
InterDigital VC Holdings, Inc.,
InterDigital Madison Patent Holdings,
SAS, and InterDigital CD Patent
Holdings, SAS*

RYAN K. YAGURA (S.B. #197619)
ryagura@omm.com
NICHOLAS J. WHILT (S.B. #247738)
nwhilt@omm.com
XIN-YI ZHOU (S.B. #251969)
vzhou@omm.com
O'MELVENY & MYERS LLP
400 South Hope Street, Suite 1900
Los Angeles, CA 90071
Telephone: 213-430-6000
Facsimile: 213-430-6407

*Attorneys for Defendants for
Defendants The Walt Disney Company,
Disney Media and Entertainment
Distribution LLC, Disney DTC LLC,
Disney Streaming Services LLC,
Disney Entertainment & Sports LLC,
Disney Platform Distribution, Inc.,
BAMTech LLC, Hulu, LLC, and ESPN,
Inc.*

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

INTERDIGITAL INC., *et al.*,

Plaintiffs and
Counterclaim-
Defendants,

v.

THE WALT DISNEY COMPANY, *et al.*,

Defendants and
Counterclaim-
Plaintiffs.

Case No. 2:25-cv-895-WLH-BFM

**JOINT CLAIM
CONSTRUCTION AND
PREHEARING STATEMENT**

Judge: Hon. Wesley L. Hsu

Hearing: Not Yet Set

Courtroom: 9B

Pursuant to S.P.R. C.4 and this Court’s Standing Order re Patent Cases (ECF No. 18), the parties respectfully submit this Joint Claim Construction and Prehearing Statement (“Joint Statement”).

I. AGREED UPON CONSTRUCTIONS

The parties agree the following terms should be construed according to the constructions set forth below:

Term / Patent, Claim	Agreed Upon Construction
“side information” U.S. Patent No. 8,085,297, claims 1-3, 10-12	“information other than main data (e.g., other than audiovisual data, pure visual data, pure audio data)”
“validity information” U.S. Patent No. 8,085,297, claims 1, 10	“information controlling a start time and/or an end time of a user interface modification”

II. PROPOSED CONSTRUCTIONS AND SUPPORTING EVIDENCE

Appendix A to this Joint Statement provides each party’s proposed constructions of the disputed terms, an identification of intrinsic evidence that supports each party’s proposed constructions, and an identification of any extrinsic evidence known to each party on which it intends to rely either to support its proposed construction or to oppose the other party’s proposed construction, including, but not limited to, as permitted by law, dictionary definitions, citations to learned treatises, and prior art.

III. LENGTH OF CLAIM CONSTRUCTION HEARING

Plaintiffs believe the default time of forty-five (45) minutes per side is sufficient to address any questions or concerns the Court may have after reviewing

1 the briefing and any technology tutorial materials submitted by the parties. Each of
2 the nine remaining claim construction disputes was raised by Defendants (with two
3 also being raised by Plaintiffs—i.e., “reference type display” and “non-reference
4 type display” for the ’268 Patent). That Defendants decided to raise nine disputes
5 (including four allegations of indefiniteness) does not justify departing from the
6 Court’s preferred time limit. Nor have Defendants identified which of their
7 proposed terms are “most significant to the case.” ECF No. 18 at 9. Defendants’
8 indefiniteness arguments rely significantly on extrinsic evidence, which the Court
9 need not reach if intrinsic evidence resolves the dispute. In any event, Defendants’
10 positions should not require additional time at the hearing because they do not
11 involve a lengthy examination of the patents or prosecution histories.

12 Defendants propose that each side be allowed seventy-five (75) minutes for
13 its presentation at the claim construction hearing. Defendants respectfully submit
14 that the additional time for each party, beyond the default time of forty-five (45)
15 minutes per side, is warranted because of the scope of this case, which involves
16 twenty five asserted claims across five patents-in-suit. Despite the large number of
17 claims Plaintiffs assert in this case, Defendants have narrowed the disputes to the
18 nine most significant disputed terms spanning across four unrelated patents.
19 Plaintiffs’ arguments in the paragraph above mischaracterize the record and
20 Defendants’ position. Two of the disputed terms were identified by Plaintiffs, and
21 Defendants’ claim construction positions rely primarily on the intrinsic evidence,
22 including the patentee’s own admissions and disclaimers during prosecution of the
23 patents-in-suit. Accordingly, Defendants respectfully request additional time for the
24 Claim Construction Hearing.

25 **IV. CLAIM CONSTRUCTION HEARING EXPERTS**

26 The parties do not anticipate calling any witnesses live at the Claim
27 Construction Hearing.

1 DATED: August 15, 2025

2 Respectfully submitted,

3
4
5 /s/ Richard Kamprath

6 Richard Kamprath

7 Richard Kamprath (admitted *pro hac*
8 *vice*)

rkamprath@mckoolsmith.com

MCKOOL SMITH, P.C.

300 Crescent Court, Suite 1200

Dallas, Texas 75201

Telephone: (214) 978-4000

Facsimile: (214) 978-4044

Joshua W. Budwin (admitted *pro hac*
11 *vice*) jbudwin@mckoolsmith.com

MCKOOL SMITH, P.C.

303 Colorado Street, Suite 2100

Austin, Texas 78701

Telephone: (512) 692-8700

Facsimile: (512) 692-8744

15 *Attorneys for Plaintiffs InterDigital,*
16 *Inc., InterDigital VC Holdings, Inc.,*
17 *InterDigital Madison Patent Holdings,*
18 *SAS, and InterDigital CD Patent*
19 *Holdings, SAS*

/s/ Ryan K. Yagura

Ryan K. Yagura

RYAN K. YAGURA

NICHOLAS J. WHILT

XIN-YI ZHOU

O'MELVENY & MYERS LLP

Attorneys for Defendants The Walt
Disney Company, Disney Media and
Entertainment Distribution LLC, Disney
DTC LLC, Disney Streaming Services
LLC, Disney Entertainment & Sports
LLC, Disney Platform Distribution,
Inc., BAMTech LLC, Hulu, LLC, and
ESPN, Inc.

ATTESTATION

Pursuant to Local Rule 5-4.3.4(a)(2), the filer attests that the other signatories listed, on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

/s/ Ryan K. Yagura

Ryan Yagura

APPENDIX A

APPENDIX A: JOINT CLAIM CONSTRUCTION CHART

Disputed Term(s) / Patent, Claim	InterDigital's Proposed Construction and Identification of Supporting Evidence	Defendants' Proposed Construction and Identification of Supporting Evidence
<p>“weighting factor”</p> <p>U.S. Patent No. 8,406,301, claims 8, 10</p>	<p>Proposed Construction: “a scaling value”</p> <p>Supporting Evidence:</p> <p>Evidence proposed by Defendants as supporting evidence.</p> <p><u>Intrinsic Evidence:</u></p> <p><i>'301 Patent and Specification:</i> Abstract, Fig. 6-7; 1:37-51, 2:40-53, 3:1-16, 3:17-31, 6:33-60, 6:61-7:28, 7:31-8:67, Claims 5, 8, 10, 11.</p> <p><u>Extrinsic Evidence:</u></p> <p>INTERDIGITAL-00000958-65, INTERDIGITAL-00000973-81, INTERDIGITAL-00001015-24, INTERDIGITAL-00001035-44, INTERDIGITAL-00001047-55, INTERDIGITAL-00001059-81, INTERDIGITAL-00001090-1104,</p>	<p>Proposed Construction: “a coefficient for a multiplication operation that scales a value”</p> <p>Supporting Evidence:</p> <p>Evidence proposed by InterDigital as supporting evidence.</p> <p><u>Intrinsic Evidence:</u></p> <p><i>'301 Patent and Specification:</i> Abstract, 1:37-51, 2:40-3:31, 4:42-5:29, 5:57-7:54, 8:11-8:67, Figs, 2-3, 5-7, Claims 5, 10.</p> <p><i>'301 File History:</i></p> <ul style="list-style-type: none"> •U.S. Provisional Patent Application Ser. No. 60/395,843, entitled “Adaptive Weighting Of Reference Pictures In Video CODEC,” filed 7/15/2002, to which the '301 Patent claims priority; •U.S. Provisional Patent Application Ser. No. 60/395,874, entitled “Motion Estimation With Weighting Prediction,”

Disputed Term(s) / Patent, Claim	InterDigital's Proposed Construction and Identification of Supporting Evidence	Defendants' Proposed Construction and Identification of Supporting Evidence
	<p>INTERDIGITAL-00001107-27, INTERDIGITAL-00001144-48</p> <p>Declaration of Pierre Moulin, D.Sc.</p> <p>Deposition testimony of Disney's expert Dr. Mayer-Patel</p> <p>Deposition testimony of InterDigital's expert Dr. Moulin</p>	<p>filed 7/15/2002, to which the '301 Patent claims priority;</p> <ul style="list-style-type: none"> •Non-Final Rejection dated 09/21/2006; •Response to Office Action dated 12/07/2006; •Final Rejection dated 03/02/2007; •Response to Office Action dated 05/01/2007; •Non-Final Rejection dated 06/29/2007; •Appeal Brief dated 08/09/2007; •Reply Brief dated 12/06/2007. <p><u>Extrinsic Evidence:</u></p> <p>Multi-frame interpolative prediction with modified syntax ("JVT-C066"), authored by Kikuchi et al. and published on March 6, 2002, by Joint Video Team (JVT) of ISO/IEC MPEG & ITU-T VCEG (DIS448-0002477–2489). <i>See, e.g.</i>, JVT-C066 at Sections 1-4.</p> <p>Improved multiple frame motion compensation using frame interpolation ("JVT-B075"), authored by Kikuchi et al.</p>

Disputed Term(s) / Patent, Claim	InterDigital's Proposed Construction and Identification of Supporting Evidence	Defendants' Proposed Construction and Identification of Supporting Evidence
		<p>and published on January 29, 2002, by Joint Video Team (JVT) of ISO/IEC MPEG & ITU-T VCEG (DIS448-0002469–2476). <i>See, e.g.</i>, JVT-B075 at Sections 1-5.</p> <p>Adaptive reference picture weighting using reference picture index (“JVT-D122”), authored by Jill Boyce and published on July 22, 2002, by Joint Video Team (JVT) of ISO/IEC MPEG & ITU-T VCEG (DIS448-0010194–0200). <i>See, e.g.</i>, JVT-D122 at 1-4.</p> <p><i>Weight</i>, Wiley Electrical And Electronics Engineering Dictionary (2004) (DIS448-0010212–0214): “a factor or coefficient which helps represent the relative importance of a given term or value.”</p> <p>Factor, The Authoritative Dictionary of IEEE Standards Terms (7th ed., 2000) (DIS448-0010215–0217): “(A) Any of the operands in a multiplication operation. (B) A number used as a multiplier to cause a</p>

Disputed Term(s) / Patent, Claim	InterDigital's Proposed Construction and Identification of Supporting Evidence	Defendants' Proposed Construction and Identification of Supporting Evidence
		<p>set of quantities to fall within a given range of values. Synonym: factor scale.”</p> <p><i>Factor</i>, Computer Dictionary (5th ed., 2002) (DIS448-0010218–0220): “an item that is multiplied in a multiplication problem; for example, 2 and 3 are factors in the problem 2 x 3.”</p> <p><i>Factor</i>, Dictionary of Science And Technology (2nd ed., 2007) (DIS448-0010221–0223): “the amount by which something is multiplied.”</p> <p>Deposition testimony of Defendants’ expert Dr. Mayer-Patel.</p> <p>Deposition testimony of InterDigital’s expert Dr. Moulin.</p>
“assigning a second weighting factor for the image block corresponding to a second reference picture index	<p>Proposed Construction:</p> <p>“assigning a second weighting factor for the image block wherein the second weighting factor and a second reference</p>	<p>Proposed Construction:</p> <p>Indefinite</p> <p>Supporting Evidence:</p>

Disputed Term(s) / Patent, Claim	InterDigital's Proposed Construction and Identification of Supporting Evidence	Defendants' Proposed Construction and Identification of Supporting Evidence
<p>corresponding to a second reference picture”</p> <p>U.S. Patent No. 8,406,301, claim 10</p>	<p>picture correspond to a second reference picture index”</p> <p>Supporting Evidence:</p> <p>Evidence proposed by Defendants as supporting evidence.</p> <p><u>Intrinsic Evidence:</u></p> <p><i>'301 Patent and Specification:</i> Abstract, Fig. 6-7; 1:37-51, 2:40-53, 3:1-16, 3:17-31, 6:33-60, 6:61-7:28, 7:31-8:67, Claims 5, 8, 10, 11.</p> <p><u>Extrinsic Evidence:</u></p> <p>INTERDIGITAL-00000958-65, INTERDIGITAL-00000973-81, INTERDIGITAL-00001015-24, INTERDIGITAL-00001035-44, INTERDIGITAL-00001047-55, INTERDIGITAL-00001059-81, INTERDIGITAL-00001090-1104, INTERDIGITAL-00001107-27, INTERDIGITAL-00001144-48</p>	<p>Evidence proposed by InterDigital as supporting evidence.</p> <p><u>Intrinsic Evidence:</u></p> <p><i>'301 Patent and Specification:</i> Abstract, 1:65-2:15, 3:17-31, 6:33-8:56, Figs. 6-7, Claims 8, 10</p> <p><i>'301 File History:</i></p> <ul style="list-style-type: none"> •Non-Final Rejection dated 09/21/2006; •Response to Office Action dated 12/07/2006; •Final Rejection dated 03/02/2007; •Response to Office Action dated 05/01/2007. <p><u>Extrinsic Evidence:</u></p> <p>7/11/25 Declaration of Dr. Mayer-Patel, explains the technology, the state of the art at the time the patent application was filed, the meaning of claim terms or phrases as they would be understood by those of ordinary skill in the art at the time of the invention in the context of the patent</p>

Disputed Term(s) / Patent, Claim	InterDigital's Proposed Construction and Identification of Supporting Evidence	Defendants' Proposed Construction and Identification of Supporting Evidence
	<p>Declaration of Pierre Moulin, D.Sc.</p> <p>Deposition testimony of Disney's expert Dr. Mayer-Patel</p> <p>Deposition testimony of InterDigital's expert Dr. Moulin</p>	<p>specification and other intrinsic/extrinsic evidence, how those of ordinary skill in the art at the time of the invention would have understood statements made by the patentee during prosecution of the applications, and the level of ordinary skill in the relevant art.</p> <p>Deposition testimony of Defendants' expert Dr. Mayer-Patel.</p> <p>Deposition testimony of InterDigital's expert Dr. Moulin.</p>
<p>"the substantially uncompressed image block"</p> <p>U.S. Patent No. 8,406,301, claim 10</p>	<p>Proposed Construction: "the image block"</p> <p>Supporting Evidence:</p> <p>Evidence proposed by Defendants as supporting evidence.</p> <p><u>Intrinsic Evidence:</u></p> <p><i>'301 Patent and Specification:</i> Abstract, Fig. 6-7; 1:37-51, 2:40-53, 3:1-16, 3:17-</p>	<p>Proposed Construction: Indefinite</p> <p>Supporting Evidence:</p> <p>Evidence proposed by InterDigital as supporting evidence.</p> <p><u>Intrinsic Evidence:</u></p>

Disputed Term(s) / Patent, Claim	InterDigital's Proposed Construction and Identification of Supporting Evidence	Defendants' Proposed Construction and Identification of Supporting Evidence
	<p>31, 6:33-60, 6:61-7:28, 7:31-8:67, Claims 5, 8, 10, 11.</p> <p><u>Extrinsic Evidence:</u></p> <p>INTERDIGITAL-00000958-65, INTERDIGITAL-00000973-81, INTERDIGITAL-00001015-24, INTERDIGITAL-00001035-44, INTERDIGITAL-00001047-55, INTERDIGITAL-00001059-81, INTERDIGITAL-00001090-1104, INTERDIGITAL-00001107-27, INTERDIGITAL-00001144-48</p> <p>Declaration of Pierre Moulin, D.Sc.</p> <p>Deposition testimony of Disney's expert Dr. Mayer-Patel</p> <p>Deposition testimony of InterDigital's expert Dr. Moulin</p>	<p>'301 Patent and Specification: Abstract, 1:65-2:14, 6:33-7:38, 8:57-68, Figs. 6-7, Claims 8, 10.</p> <p>'301 File History:</p> <ul style="list-style-type: none"> •Non-Final Rejection dated 09/21/2006; •Response to Office Action dated 12/07/2006; •Final Rejection dated 03/02/2007; •Response to Office Action dated 05/01/2007. <p><u>Extrinsic Evidence:</u></p> <p>7/11/25 Declaration of Dr. Mayer-Patel, explains the technology, the state of the art at the time the patent application was filed, the meaning of claim terms or phrases as they would be understood by those of ordinary skill in the art at the time of the invention in the context of the patent specification and other intrinsic/extrinsic evidence, how those of ordinary skill in the art at the time of the invention would have understood statements made by the</p>

Disputed Term(s) / Patent, Claim	InterDigital's Proposed Construction and Identification of Supporting Evidence	Defendants' Proposed Construction and Identification of Supporting Evidence
		<p>patentee during prosecution of the applications, and the level of ordinary skill in the relevant art.</p> <p>Deposition testimony of Defendants' expert Dr. Mayer-Patel.</p> <p>Deposition testimony of InterDigital's expert Dr. Moulin.</p>
<p>"intra prediction for at least one of the pixels within the second group is obtained by using pixels from neighboring pixels within the first group of pixels in blocks already coded and neighboring pixels outside the block that have already been coded"</p> <p>U.S. Patent No. 10,805,610, claim 6</p>	<p>Proposed Construction: "determining at least one pixel in the second group using already coded pixels within the first group and outside the block"</p> <p>Supporting Evidence:</p> <p><u>Intrinsic Evidence:</u></p> <p><i>'610 Patent and Specification:</i> Abstract, Figs 1-4D, 7-8; 1:21-41, 1:32-2:7, 2:8-3:8, 3:23-26, 8:17-55, 9:15-53, 10:1-34, Claims 1, 6, 7, 10, 11, 16, 21.</p> <p><u>Extrinsic Evidence:</u></p>	<p>Proposed Construction: Indefinite</p> <p>Supporting Evidence:</p> <p>Evidence proposed by InterDigital as supporting evidence.</p> <p><u>Intrinsic Evidence:</u></p> <p><i>'610 Patent and Specification:</i> Title, Abstract, 3:30-4:3, 4:13-18, 30-32, 8:17-9:53, 10:62-11:63, Fig. 7, Claims 1, 6, 11, 16, 21.</p> <p><i>'610 File History:</i></p>

Disputed Term(s) / Patent, Claim	InterDigital's Proposed Construction and Identification of Supporting Evidence	Defendants' Proposed Construction and Identification of Supporting Evidence
	<p>Evidence proposed by Defendants as supporting evidence.</p> <p>Declaration of Pierre Moulin, D.Sc.</p> <p>Deposition testimony of Disney's expert Dr. Mayer-Patel</p> <p>Deposition testimony of InterDigital's expert Dr. Moulin</p>	<p>•Non-Final Rejection dated 11/7/2019 (including the Examiner's citation of U.S. Patent App. Pub. No. 2009/0232211 ("Chen"));</p> <p>•Amendment and Response dated 2/5/2020 (including the patentee's discussion of U.S. Patent App. Pub. No. 2009/0232211 ("Chen")).</p> <p><u>Extrinsic Evidence:</u></p> <p>H.264 Standard (DIS448-0003425–4094). <i>See, e.g.</i>, H.264 Standard, Section 8.3 ("Intra prediction process") (DIS448-0003575–3596).</p> <p>Richardson (DIS448-0003131–3424). <i>See, e.g.</i>, Richardson, Section 6.4.6 ("Intra Prediction") (DIS448-0003323–3330).</p> <p>7/11/25 Declaration of Dr. Mayer-Patel, explains the technology, the state of the art at the time the patent application was filed, the meaning of claim terms or phrases as they would be understood by those of</p>

Disputed Term(s) / Patent, Claim	InterDigital's Proposed Construction and Identification of Supporting Evidence	Defendants' Proposed Construction and Identification of Supporting Evidence
		<p>ordinary skill in the art at the time of the invention in the context of the patent specification and other intrinsic/extrinsic evidence, how those of ordinary skill in the art at the time of the invention would have understood statements made by the patentee during prosecution of the applications, and the level of ordinary skill in the relevant art.</p> <p>Deposition testimony of Defendants' expert Dr. Mayer-Patel.</p> <p>Deposition testimony of InterDigital's expert Dr. Moulin.</p>
<p>"[a] reference type display[] having [a] reference color gamut"</p> <p>U.S. Patent No. 9,185,268, claims 1, 6, 7, 8, 11</p>	<p>Proposed Construction: "display capable of accurately displaying colors in accordance with a standardized color gamut"</p> <p>Supporting Evidence: Evidence proposed by Defendants as supporting evidence.</p>	<p>Proposed Construction: "a display that supports a standardized color gamut"</p> <p>Supporting Evidence: Evidence proposed by InterDigital as supporting evidence.</p>

Disputed Term(s) / Patent, Claim	InterDigital's Proposed Construction and Identification of Supporting Evidence	Defendants' Proposed Construction and Identification of Supporting Evidence
	<p><u>Intrinsic Evidence:</u></p> <p>'268 Patent and Specification: Abstract, Figs. 1-8, 1:11-4:16, 4:21-40, 5:42-6:2, 6:16-24, 6:34-46, 7:9-29, 7:42-45, 8:25-67, 9:6-49, 9:57-10:37, 10:43-11:10, 11:19-46, Claims 1-11.</p> <p><u>Extrinsic Evidence:</u></p> <p>INTERDIGITAL-00003501-3511, INTERDIGITAL-00003519-3531, INTERDIGITAL-00004042-4053, INTERDIGITAL-00004059-4068, INTERDIGITAL-00004073-4084, INTERDIGITAL-00004125-4144, INTERDIGITAL-00004154-4161, INTERDIGITAL-00004170-4179, INTERDIGITAL-00004412-4431, INTERDIGITAL-00004433-4440, INTERDIGITAL-00004484-4487</p> <p>Declaration of Dr. Sprenger</p>	<p><u>Intrinsic Evidence:</u></p> <p>'268 Patent and Specification: Abstract, 1:15-3:67, 4:41-5:35, 7:9-18, Figs. 1-3, Claims 1-11.</p> <p>'268 File History:</p> <ul style="list-style-type: none"> •Non-Final Rejection dated 02/20/2013; •Response to Office Action dated 07/22/2013; •Non-Final Rejection dated 12/30/2013; •Response to Office Action dated 6/30/2014. <p><u>Extrinsic Evidence:</u></p> <p>Euan Smith et al., <i>Evaluating Display Color Capability</i>, Information Display, 36(5), 9-15 (2020) ("Smith-1") (DIS448-0010224–0230). <i>See, e.g.</i>, Smith-1 at Fig. 3.</p> <p>Kenichiro Masaoka et al., <i>Visualization Of Reproducible Object Colors In Standard Color Spaces Using The Gamut Ring Intersection</i>, Journal of the Society for</p>

Disputed Term(s) / Patent, Claim	InterDigital's Proposed Construction and Identification of Supporting Evidence	Defendants' Proposed Construction and Identification of Supporting Evidence
	<p>Deposition testimony of Disney's expert Dr. Mayer-Patel</p> <p>Deposition testimony of InterDigital's expert Dr. Sprenger</p>	<p>Information Display, 33(4):231-245 (2025) ("Masaoka") (DIS448-0010322-0336). <i>See, e.g.</i>, Masaoka at 235.</p> <p>Euan Smith et al., <i>Measuring The Color Capability Of Modern Display Systems</i>, Journal of the Society for Information Display, 28(6):548-556 (2020) ("Smith-2") (DIS448-0010231-0240). <i>See, e.g.</i>, Smith-2 at 549.</p> <p>Byongtae Ryu et al., <i>New RGB Primary For Various Multimedia Systems</i>, Journal of Information Display, 15:2, 65-70 (2014) ("Ryu") (DIS448-0010241-0247). <i>See, e.g.</i>, Ryu at 68.</p> <p>Jack Holm et al., <i>Definition & Use of the ISO 12640-3 Reference Color Gamut</i>, Color and Imaging Conference 2006 (1):62-68 ("Holm") (DIS448-0010201-0207). <i>See, e.g.</i>, Holm at 62.</p> <p>Recommendation ITU-R BT.709-5, Parameter values for the HDTV standards for production and international</p>

Disputed Term(s) / Patent, Claim	InterDigital's Proposed Construction and Identification of Supporting Evidence	Defendants' Proposed Construction and Identification of Supporting Evidence
		<p>programme exchange (“Rec. 709”) (DIS448-0010255–0286). <i>See, e.g.</i>, Rec. 709 at 2-5, 18-20.</p> <p>Recommendation ITU-R BT.2020, Parameter values for ultra-high definition television systems for production and international programme exchange (“Rec. 2020”) (DIS448-0010248–0254). <i>See, e.g.</i>, Rec. 2020 at 1-5.</p> <p>U.S. Patent Application Publication No. 2005/0152612 (“Spaulding”) (DIS448-0010294–0302). <i>See, e.g.</i>, Spaulding ¶¶ 3-11, 16-30, Fig. 3.</p> <p>7/11/25 Declaration of Dr. Mayer-Patel, explains the technology, the state of the art at the time the patent application was filed, the meaning of claim terms or phrases as they would be understood by those of ordinary skill in the art at the time of the invention in the context of the patent specification and other intrinsic/extrinsic evidence, how those of ordinary skill in</p>

Disputed Term(s) / Patent, Claim	InterDigital's Proposed Construction and Identification of Supporting Evidence	Defendants' Proposed Construction and Identification of Supporting Evidence
		<p>the art at the time of the invention would have understood statements made by the patentee during prosecution of the applications, and the level of ordinary skill in the relevant art.</p> <p>Deposition testimony of Defendants' expert Dr. Mayer-Patel.</p> <p>Deposition testimony of InterDigital's expert Dr. Sprenger.</p>
<p>“[a] non-reference type display[] having [a] non-reference color gamut”</p> <p>U.S. Patent No. 9,185,268, claims 1, 6, 8, 11</p>	<p>Proposed Construction: “display capable of displaying colors in accordance with a color gamut other than the reference color gamut”</p> <p>Supporting Evidence: Evidence proposed by Defendants as supporting evidence.</p> <p><u>Intrinsic Evidence:</u> <i>'268 Patent and Specification:</i> Abstract, Figs. 1-8, 1:11-4:16, 4:21-40, 5:42-6:2,</p>	<p>Proposed Construction: “a display that does not support a standardized color gamut”</p> <p>Supporting Evidence: Evidence proposed by InterDigital as supporting evidence.</p> <p><u>Intrinsic Evidence:</u> <i>'268 Patent and Specification:</i> Abstract, 1:15-3:67, 4:41-5:35, 7:9-18, Figs. 1-3, Claims 1-11.</p>

Disputed Term(s) / Patent, Claim	InterDigital's Proposed Construction and Identification of Supporting Evidence	Defendants' Proposed Construction and Identification of Supporting Evidence
	<p>6:16-24, 6:34-46, 7:9-29, 7:42-45, 8:25-67, 9:6-49, 9:57-10:37, 10:43-11:10, 11:19-46, Claims 1-11.</p> <p><u>Extrinsic Evidence:</u></p> <p>INTERDIGITAL-00003501-3511, INTERDIGITAL-00003519-3531, INTERDIGITAL-00004042-4053, INTERDIGITAL-00004059-4068, INTERDIGITAL-00004073-4084, INTERDIGITAL-00004125-4144, INTERDIGITAL-00004154-4161, INTERDIGITAL-00004170-4179, INTERDIGITAL-00004412-4431, INTERDIGITAL-00004433-4440, INTERDIGITAL-00004484-4487</p> <p>Declaration of Dr. Sprenger</p> <p>Deposition testimony of Disney's expert Dr. Mayer-Patel</p> <p>Deposition testimony of InterDigital's expert Dr. Sprenger</p>	<p>'268 <i>File History</i>:</p> <ul style="list-style-type: none"> •Non-Final Rejection dated 02/20/2013; •Response to Office Action dated 07/22/2013; •Non-Final Rejection dated 12/30/2013; •Response to Office Action dated 6/30/2014. <p><u>Extrinsic Evidence:</u></p> <p>Euan Smith et al., <i>Evaluating Display Color Capability</i>, Information Display, 36(5), 9-15 (2020) ("Smith-1") (DIS448-0010224–0230). <i>See, e.g.</i>, Smith-1 at Fig. 3.</p> <p>Kenichiro Masaoka et al., <i>Visualization Of Reproducible Object Colors In Standard Color Spaces Using The Gamut Ring Intersection</i>, Journal of the Society for Information Display, 33(4):231-245 (2025) ("Masaoka") (DIS448-0010322–0336). <i>See, e.g.</i>, Masaoka at 235.</p>

Disputed Term(s) / Patent, Claim	InterDigital's Proposed Construction and Identification of Supporting Evidence	Defendants' Proposed Construction and Identification of Supporting Evidence
		<p>Euan Smith et al., <i>Measuring The Color Capability Of Modern Display Systems</i>, Journal of the Society for Information Display, 28(6):548-556 (2020) (“Smith-2”) (DIS448-0010231–0240). <i>See, e.g.</i>, Smith-2 at 549.</p> <p>Byongtae Ryu et al., <i>New RGB Primary For Various Multimedia Systems</i>, Journal of Information Display, 15:2, 65-70 (2014) (“Ryu”) (DIS448-0010241–0247). <i>See, e.g.</i>, Ryu at 68.</p> <p>Jack Holm et al., <i>Definition & Use of the ISO 12640-3 Reference Color Gamut</i>, Color and Imaging Conference 2006 (1):62-68 (“Holm”) (DIS448-0010201–0207). <i>See, e.g.</i>, Holm at 62.</p> <p>Recommendation ITU-R BT.709-5, Parameter values for the HDTV standards for production and international programme exchange (“Rec. 709”) (DIS448-0010255–0286). <i>See, e.g.</i>, Rec. 709 at 2-5, 18-20.</p>

Disputed Term(s) / Patent, Claim	InterDigital's Proposed Construction and Identification of Supporting Evidence	Defendants' Proposed Construction and Identification of Supporting Evidence
		<p>Recommendation ITU-R BT.2020, Parameter values for ultra-high definition television systems for production and international programme exchange ("Rec. 2020") (DIS448-0010248-0254). <i>See, e.g.</i>, Rec. 2020 at 1-5.</p> <p>U.S. Patent Application Publication No. 2005/0152612 ("Spaulding") (DIS448-0010294-0302). <i>See, e.g.</i>, Spaulding ¶¶ 3-11, 16-30, Fig. 3.</p> <p>7/11/25 Declaration of Dr. Mayer-Patel, explains the technology, the state of the art at the time the patent application was filed, the meaning of claim terms or phrases as they would be understood by those of ordinary skill in the art at the time of the invention in the context of the patent specification and other intrinsic/extrinsic evidence, how those of ordinary skill in the art at the time of the invention would have understood statements made by the patentee during prosecution of the</p>

Disputed Term(s) / Patent, Claim	InterDigital's Proposed Construction and Identification of Supporting Evidence	Defendants' Proposed Construction and Identification of Supporting Evidence
		<p>applications, and the level of ordinary skill in the relevant art.</p> <p>Deposition testimony of Defendants' expert Dr. Mayer-Patel.</p> <p>Deposition testimony of InterDigital's expert Dr. Sprenger.</p>
<p>"at least one of a nonreference type display having a nonreference color gamut and a reference type display having a reference color gamut"</p> <p>U.S. Patent No. 9,185,268, claims 1, 6</p>	<p>Proposed Construction: Plain and ordinary meaning: "one or both of a display capable of accurately displaying colors in accordance with a standardized color gamut and a display capable of displaying colors in accordance with a color gamut other than the reference color gamut"</p> <p>Supporting Evidence: Evidence proposed by Defendants as supporting evidence.</p> <p><u>Intrinsic Evidence:</u></p>	<p>Proposed Construction: "at least one of each category of displays selected from category (1) a non-reference type display having a nonreference color gamut and category (2) a reference type display having a reference color gamut"</p> <p>Supporting Evidence: Evidence proposed by InterDigital as supporting evidence.</p> <p><u>Intrinsic Evidence:</u> '268 Patent and Specification: Abstract, 4:41-5:35, 7:9-18, 8:25-35, Figs. 5-6, Claims 1-11.</p>

Disputed Term(s) / Patent, Claim	InterDigital's Proposed Construction and Identification of Supporting Evidence	Defendants' Proposed Construction and Identification of Supporting Evidence
	<p><i>'268 Patent and Specification:</i> Abstract, Figs. 1-8, 1:11-4:16, 4:21-5:35, 5:42-6:2, 6:16-24, 6:34-46, 7:9-29, 7:30-41, 7:42-45, 8:25-67, 9:6-49, 9:57-10:37, 10:43-11:10, 11:19-46, Claims 1-12, 15, 20, 25.</p> <p><u>Extrinsic Evidence:</u></p> <p>INTERDIGITAL-00003501-3511, INTERDIGITAL-00003519-3531, INTERDIGITAL-00004042-4053, INTERDIGITAL-00004059-4068, INTERDIGITAL-00004073-4084, INTERDIGITAL-00004125-4144, INTERDIGITAL-00004154-4161, INTERDIGITAL-00004170-4179, INTERDIGITAL-00004412-4431, INTERDIGITAL-00004433-4440, INTERDIGITAL-00004484-4487</p> <p>Declaration of Dr. Sprenger</p> <p>Deposition testimony of Disney's expert Dr. Mayer-Patel</p>	<p><i>'268 File History:</i></p> <ul style="list-style-type: none"> •Non-Final Rejection dated 02/20/2013; •Response to Office Action dated 07/22/2013. <p><u>Extrinsic Evidence:</u></p> <p>Deposition testimony of Defendants' expert Dr. Mayer-Patel.</p> <p>Deposition testimony of InterDigital's expert Dr. Sprenger.</p>

Disputed Term(s) / Patent, Claim	InterDigital's Proposed Construction and Identification of Supporting Evidence	Defendants' Proposed Construction and Identification of Supporting Evidence
	Deposition testimony of InterDigital's expert Dr. Sprenger	
<p>“side information components for modifying a functionality of said user interface”</p> <p>U.S. Patent No. 8,085,297, claim 1</p>	<p>Proposed Construction: Plain and ordinary meaning</p> <p>Supporting Evidence:</p> <p>Evidence proposed by Defendants as supporting evidence.</p> <p><u>Intrinsic Evidence:</u></p> <p><i>'297 Patent and Specification:</i> Abstract, 1:8-12, 1:15-21, 1:22-35, 1:39-44, 1:45-57, 2:8-25, 2:26-48, 2:49-53, 2:54-56, 2:57-67, 3:1-6, 3:11-25, Fig. 1, Claims 1-3, 5-9, 13-16</p> <p><u>Extrinsic Evidence:</u></p> <p>Declaration of Dr. Sprenger</p> <p>Deposition testimony of Disney's expert Dr. Mayer-Patel</p>	<p>Proposed Construction: Means-plus-function under 35 U.S.C. § 112, ¶ 6 <i>Function:</i> modifying a functionality of the user interface</p> <p><i>Structure:</i> Indefinite</p> <p>Supporting Evidence:</p> <p>Evidence proposed by InterDigital as supporting evidence.</p> <p><u>Intrinsic Evidence:</u></p> <p><i>'297 Patent and Specification:</i> Abstract, 2:36-48, 3:11-25, Claim 1</p> <p><i>'297 File History:</i></p> <p><u>Extrinsic Evidence:</u></p>

Disputed Term(s) / Patent, Claim	InterDigital's Proposed Construction and Identification of Supporting Evidence	Defendants' Proposed Construction and Identification of Supporting Evidence
	Deposition testimony of InterDigital's expert Dr. Sprenger	<p>7/11/25 Declaration of Dr. Mayer-Patel, explains the technology, the state of the art at the time the patent application was filed, the meaning of claim terms or phrases as they would be understood by those of ordinary skill in the art at the time of the invention in the context of the patent specification and other intrinsic/extrinsic evidence, how those of ordinary skill in the art at the time of the invention would have understood statements made by the patentee during prosecution of the applications, and the level of ordinary skill in the relevant art.</p> <p>Deposition testimony of Defendants' expert Dr. Mayer-Patel.</p> <p>Deposition testimony of InterDigital's expert Dr. Sprenger.</p>
"modifying a way in which said user can provide input into said user interface by using	<p>Proposed Construction: Plain and ordinary meaning</p> <p>Supporting Evidence:</p>	<p>Proposed Construction: "modifying the way in which the user can input commands or operations into said user interface (e.g. changing from</p>

Disputed Term(s) / Patent, Claim	InterDigital's Proposed Construction and Identification of Supporting Evidence	Defendants' Proposed Construction and Identification of Supporting Evidence
<p>said stored side information components”</p> <p>U.S. Patent No. 8,085,297, claim 1</p>	<p>Evidence proposed by Defendants as supporting evidence.</p> <p><u>Intrinsic Evidence:</u></p> <p><i>'297 Patent and Specification:</i> Abstract, 1:8-12, 1:15-21, 1:22-35, 1:39-44, 1:45-57, 2:8-25, 2:26-48, 2:49-53, 2:54-56, 2:57-67, 3:1-6, 3:11-25, Fig. 1</p> <p><i>'297 File History:</i></p> <ul style="list-style-type: none"> •Non-Final Rejection dated 03/06/2007; •Response to Office Action dated 08/30/2007; •Final Rejection dated 11/29/2007; •Response to Office Action dated 02/25/2008; •Appeal Brief dated 08/07/2008; •Reply Brief dated 12/22/2008 <p><u>Extrinsic Evidence:</u></p> <p>Declaration of Dr. Sprenger</p> <p>Deposition testimony of Disney's expert Dr. Mayer-Patel</p>	<p>“pushing a displayed button” to “uttering the respective keyword”) by using the stored side information components”</p> <p>Supporting Evidence:</p> <p>Evidence proposed by InterDigital as supporting evidence.</p> <p><u>Intrinsic Evidence:</u></p> <p><i>'297 Patent and Specification:</i> Abstract, 1:22-35, 3:13-23, Figure 1</p> <p><i>'297 File History:</i></p> <ul style="list-style-type: none"> •Non-Final Rejection dated 03/06/2007; •Response to Office Action dated 08/30/2007; •Final Rejection dated 11/29/2007; •Response to Office Action dated 02/25/2008; •Appeal Brief dated 08/07/2008; •Reply Brief dated 12/22/2008 <p><u>Extrinsic Evidence:</u></p>

Disputed Term(s) / Patent, Claim	InterDigital's Proposed Construction and Identification of Supporting Evidence	Defendants' Proposed Construction and Identification of Supporting Evidence
	Deposition testimony of InterDigital's expert Dr. Sprenger	Deposition testimony of Defendants' expert Dr. Mayer-Patel. Deposition testimony of InterDigital's expert Dr. Sprenger.